

1 [Parties and Counsel Listed on Signature Pages]
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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**META AND WISCONSIN DEPARTMENT
OF JUSTICE'S STIPULATION AND
~~[PROPOSED]~~ ORDER EXTENDING
DEADLINE TO COMPLETE WISCONSIN
FACT WITNESS CASIE SULZLE'S
DEPOSITION**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-2 and 7-12, Wisconsin Department of Justice (“WI DOJ”) and
 2 Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms
 3 Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned
 4 counsel, hereby stipulate as follows:

5 1. Under the schedule ordered by Magistrate Judge Kang on July 2, 2025, the current
 6 deadline for Meta to complete the depositions of State of Wisconsin (“Wisconsin”) witnesses is August
 7 29, 2025. *See* ECF 2091.

8 2. Meta and the WI DOJ have worked in good faith to confer about, notice, and schedule
 9 Wisconsin witnesses. For Wisconsin Department of Public Instruction employee Casie Sulzle’s
 10 deposition, the Parties originally scheduled the deposition for July 1, 2025. But the day before her
 11 deposition, agency counsel for the Wisconsin Department of Public Instruction advised that Ms. Sulzle
 12 was on leave under the Family Medical Leave Act and not available for her deposition. Following
 13 additional conferrals, the WI DOJ told Meta that Ms. Sulzle will be on leave until at least September 2,
 14 2025, after which time the WI DOJ will provide Meta with Ms. Sulzle’s availability for deposition.

15 3. In light of Ms. Sulzle’s leave, the Parties have agreed to extend the existing August 29,
 16 2025 deadline for Meta to complete Ms. Sulzle’s deposition. The parties have agreed to extend the
 17 deadline through September 30, 2025, and given the ongoing nature of Ms. Sulzle’s leave agree to work
 18 together in good faith and seek any further extensions from this court as needed.

19 4. This Court has previously extended Meta’s deadline to complete fact and Rule 30(b)(6)
 20 depositions of State witnesses twice. *See* ECF 1696, 2091. This stipulated extension of the deadline for
 21 Meta to complete Ms. Sulzle’s deposition does not and will not affect any other deadlines already set or
 22 that may be set in this action, nor the deposition time limits already set in ECF 1696, nor does it affect
 23 any party’s or non-party’s rights in relation to any other deadlines.

24 5. Therefore, the Parties agree that the following shall apply:

25 a. Subject to the Court’s approval, Meta’s deadline to complete its deposition of
 26 Casie Sulzle shall be extended through and including September 30, 2025.

1 Respectfully submitted,

2 DATED: August 29, 2025

COVINGTON & BURLING LLP

3 By: /s/ Ashley M. Simonsen

4 Ashley M. Simonsen, SBN 275203
5 COVINGTON & BURLING LLP
6 1999 Avenue of the Stars
7 Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

8 *Attorneys for Meta Platforms, Instagram, LLC; Meta*
9 *Payments, Inc.; and Meta Platforms Technologies, LLC*

10 JOSHUA L. KAUL
11 Attorney General State of Wisconsin

12 By: /s/ Brittany A. Copper

13 Brittany A. Copper, Assistant Attorney General
14 WI State Bar # 1142446, *pro hac vice app*
forthcoming
15 Wisconsin Department of Justice
Post Office Box 7857
16 Madison, Wisconsin 53707-7857
Phone: (608) 261-9224
Email: Brittany.copper@widsoj.gov

17 *Attorneys for Plaintiff State of Wisconsin*

1 **ATTESTATION**
2

3 I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence
4 to the filing of this document has been obtained from each signatory hereto.
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6 Dated: August 29, 2025
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8 By: /s/ Ashley M. Simonsen
9 Ashley M. Simonsen
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1 **[PROPOSED] ORDER**
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3 By agreement of the Parties, and for good cause shown, **IT IS SO ORDERED.**
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5 Dated: August 29, 2025, 2025
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8 Magistrate Judge Hon. Peter H. Kang
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